

GABROY LAW OFFICES
 Christian Gabroy (#8805)
 Kaine Messer (#14240)
 The District at Green Valley Ranch
 170 South Green Valley Parkway, Suite 280
 Henderson, Nevada 89012
 Tel (702) 259-7777
 Fax (702) 259-7704
 christian@gabroy.com
 kmesser@gabroy.com
 Attorneys for Plaintiff/Counter-Defendant
 Russell LeBarron

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

RUSSELL LEBARRON, an individual;

Plaintiff,

vs.

INTERSTATE GROUP, LLC; DOES I
 through X; and ROE Corporations XI
 through XX, inclusive,

Defendant.

INTERSTATE GROUP, LLC;

Counterclaimant,

vs.

RUSSELL LEBARRON,

Counter-Defendant.

Case No.: 2:19-cv-01739-JCM-DJA

**STIPULATION TO EXTEND TIME
 TO RESPOND TO DEFENDANT'S
 MOTION TO DISMISS SECOND
 AMENDED COMPLAINT, OR
 ALTERNATIVELY, MOTION FOR
 SUMMARY JUDGMENT (ECF No. 64)
 AND TO EXTEND DEADLINE TO FILE
 DISPOSITIVE MOTIONS**

(First Request)

**STIPULATION TO EXTEND TIME TO RESPOND TO DEFENDANT'S MOTION
 TO DISMISS SECOND AMENDED COMPLAINT, OR ALTERNATIVELY,
 MOTION FOR SUMMARY JUDGMENT (ECF No. 64) AND TO EXTEND
 DEADLINE TO FILE DISPOSITIVE MOTIONS**

Plaintiff/Counter-Defendant Russell LeBarron and Defendant/Counterclaimant Interstate Group, LLC, by and through their respective counsel of record, hereby stipulate to the following extension of time for Plaintiff/Counter-Defendant Russell LeBarron to respond to Defendant/Counterclaimant Interstate Group, LLC Motion to Dismiss Second Amended Complaint, or Alternatively, Motion for Summary Judgment (ECF No. 64). Plaintiff/Counter-Defendant's response is currently due August 17, 2020.

The parties hereby agree that Plaintiff/Counter-Defendant's response to the Motion shall be due on **September 30, 2020**.

This is the first request for an extension of time to file a response to the motion.

Further, the parties hereby agree that the deadline to file dispositive motions shall be extended from September 29, 2020 to **October 31, 2020**.

Good cause readily exists for this request. The FRCP 30(b)(6) deposition of Defendant/Counterclaimant Interstate Group, LLC is currently scheduled for August 21, 2020 as is the deposition of a witness on August 28, 2020. The parties make this request in good faith to conserve resources and to allow such discovery efforts to occur prior to the full briefing of Defendant/Counterclaimant Interstate Group, LLC's Motion (ECF No. 64).

This request is not sought for any improper purpose or other reason of delay.

Dated this _11th_ day of August 2020. Dated this _11th_ day of August 2020.

Respectfully submitted,

Respectfully submitted,

/s/ Christian Gabroy

/s/ Malani L. Kotchka, Esq.

Christian Gabroy, Esq.
Nev. Bar No. 8805
GABROY LAW OFFICES
170 S. Green Valley Parkway, Ste 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704

Malani L. Kotchka, Esq.
Nev. Bar No. 0283
HEJMANOWSKI & MCCREA LLC
520 South Fourth Street, Suite 320
Las Vegas, NV 89101
Tel: (702) 834-8777
Fax: (702) 834-5262

Attorneys for Plaintiff/Counter-Defendant

Attorney for Defendant/Counterclaimant

IT IS SO ORDERED.

August 12, 2020

Date


UNITED STATES DISTRICT JUDGE